

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:

DURA AUTOMOTIVE SYSTEMS, LLC, et al.<sup>1</sup>

Debtors.

Chapter 11

Judge Karen B. Owens

Case No. 19-12378-KBO

(Jointly Administered)

---

**Limited, Protective Objection of Kenwal Steel Corp. to Proposed Cure Costs as Stated in  
the Supplemental Notice to Confidential Contract Parties to Potentially Assumed  
Executory Contracts and Unexpired Leases [Doc. 748]**

For this limited , protective objection, Kenwal Steel Corp. (“Kenwal”), states:

1. Before the Debtor’s petition date, Kenwal sold various raw steel products to one or more of the Debtors.

2. At the petition date Kenwal was, and still is, owed \$416,798.27 for deliveries before the Debtors filed their bankruptcies.

3. In the Supplemental Notice referenced above, the Debtors indicate that Kenwal’s Purchase Order #14017500 may be assumed and assigned to a purchaser of the Debtor’s assets. The Cure Amount is stated as “\$0.00”: [See Doc. 748-1, at p. 22].

4. Kenwal’s records reflect that Purchase Order #14017500 is inactive. However, Kenwal is still owed \$416,788.27 on other Purchase Orders, as reflected in its filed claims.

5. To the extent the Debtors purport to assume any other contract(s) with Kenwal, other than inactive Purchase Order #14017500, Kenwal objects to such assumption unless Kenwal

---

<sup>1</sup> The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity’s federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693).

is paid in full the \$416,788.27 it is owed. Kenwal also reserves its rights to assert any other objections to the assumption of its active purchase orders if it turns out the Debtors intend to assume those.

Dated: March 20, 2020

Respectfully submitted,

By: /s/ Matthew E. Wilkins

Matthew E. Wilkins (P56697)

*One of Its Attorneys*

**Brooks Wilkins Sharkey & Turco, PLLC**

401 S. Old Woodward Avenue, Suite 400

Birmingham, MI 48009

248-971-1711; 248-971-1801 – Facsimile

[wilkins@bwst-law.com](mailto:wilkins@bwst-law.com)

*Attorneys for Kenwal Steel Corp.*